

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

NICOLE SANDERS

Plaintiff,

v.

**MARY HENSLEY, DENNIS CROWSON,
SHERI RICH, and ERIKAH BROWN,
Defendants.**

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Case No. 1:15-cv-00426-LY

**DEFENDANTS MARY HENSLEY, DENNIS CROWSON, SHERI RICH, and ERIKAH
BROWN'S UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO
PLAINTIFF'S AMENDED COMPLAINT**

TO THE HONORABLE JUDGE OF THE COURT:

Defendants move for an extension of time as follows:

1. This is a free speech suit. Plaintiff is a student at Blinn College, and the Defendants are employees at Blinn College. On Friday, August 14, 2015, the Plaintiff filed an amended complaint. Defendants' response is due on Friday, August 28, 2015.

2. Defendants' counsel requests an extension of time through Friday, September 11, 2015, in which to file Defendants' response. The reasons for this request include the following:

- (a) Defendants' counsel is preparing for oral argument in the United States Court of Appeals for Fifth Circuit. That argument will take place in New Orleans on Monday, August 31, 2015, in Case No. 14-20778.
- (b) Defendants' counsel has three submissions before the U.S. Equal Employment Commission that are due the week of August 24, 2015 (EEOC Charge No. 846-2015-14619; EEOC Charge No. 460-2014-04134; and EEOC Charge No. 460-2015-030840). The deadlines in these cases have already been previously extended by that agency.
- (c) Defendants' counsel has jury duty in Brazoria County, Texas on August 24, 2015.

Due to these conflicting obligations, particularly preparations for the Fifth Circuit oral argument and completion of the EEOC submissions, counsel needs additional time to prepare the response in this case.

Defendant respectfully prays that the Court extend the time for filing Defendants' response to September 11, 2015.

By: /s/ Lisa A. Brown
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CERTIFICATE OF CONFERENCE

I hereby certify that I contacted Nicole Williams and Ronald London on August 18, 2015, regarding the substance of this motion. Mr. London indicated on August 20, 2015 that he is not opposed to this motion.

/s/ Lisa A. Brown

Lisa A. Brown

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Defendants Mary Hensley, Dennis Crowson, Sheri Rich, and Erikah Brown's Unopposed Motion to Extend Time for Filing an Answer* has been served on all known counsel of record for Plaintiff via ECF on this 24th day of August, 2015, properly addressed as follows:

Mr. Robert Corn-Revere
Mr. Ronald G. London
Ms. Lisa B. Zycherman

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/s/ Lisa A. Brown

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